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11  
12 **UNITED STATES DISTRICT COURT**  
13  
14 **DISTRICT OF NEVADA**

15 SERGIO DE LA CANAL, an individual  
16  
17 Plaintiff,  
18  
19 v.  
20 VW CREDIT, INC., a foreign corporation,  
21  
22 Defendant.

Case No. 2:23-cv-00131-ART-NJK

23 **UNOPPOSED MOTION TO EXTEND**  
24 **TIME TO RESPOND TO PLAINTIFF'S**  
25 **COMPLAINT**  
26 **(First Request)**

27 Defendant VW Credit, Inc. ("VCI") by and through its undersigned counsel of record,  
28 hereby submits the following Unopposed Motion to Extend Time to Respond to Plaintiff Sergio  
De La Canal's ("Plaintiff") Complaint (First Request):

On January 24, 2023, Plaintiff filed his Complaint for purported Violations of the Fair  
Credit Reporting Act, 15 U.S.C. § 1681, et seq. [ECF No. 1]. The Complaint and Summons were  
purportedly served on VCI on January 26, 2023, creating a response deadline of February 16, 2023.

VCI's counsel is still investigating the allegations raised in Plaintiff's Complaint and is  
evaluating a settlement demand with supporting documents from Plaintiff. Plaintiff and VCI have  
discussed extending VCI's response deadline by 30-days to March 20, 2023 accordingly. On  
February 8, 2023, Plaintiff's counsel approved the 30-day extension.

Based upon the foregoing, VCI respectfully requests that the Court extend the deadline for  
VCI to file its response to Plaintiff's Complaint to March 20, 2023. This is the first request for

1 extension of time for VCI to respond to Plaintiff's Complaint. The extension is requested in good  
2 faith and is not for purposes of delay or prejudice to any other party.

3  
4 Dated 14<sup>th</sup> day of February, 2023.

5 WRIGHT, FINLAY & ZAK, LLP

6 */s/ Jory C. Garabedian*

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13 *Attorneys for VW Credit, Inc.*

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15 **IT IS SO ORDERED:**

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UNITED STATES MAGISTRATE JUDGE

18 DATED: February 15, 2023